

O'Bergh, Jon

From: Nancy Melton <Nancy_Melton@berea.edu>
Sent: Monday, December 22, 2014 9:12 AM
To: College Feedback
Cc: Theresa Lowder
Subject: College ratings

College feedback,

I have read with great interest the new proposal for college ratings.

I feel most of this data is already available for public observation so this wouldn't create too much of a burden to collect this data. But, I'm somewhat concerned when we are collecting information on *jobs after college in the category of Labor Market Success*, I would hate to see us add one more layer of work to already overburdened colleges to try to determine the earnings of recent graduates.

We appreciate your efforts to try to provide greater transparency to students and parents to find the best buy in colleges, but please don't add additional collection burdens. Thanks for listening.

Nancy Melton

Nancy M. Melton
Director of Student Financial Aid Services
Berea College
859.985.3313

O'Bergh, Jon

From: Melanie Tyner-Wilson <(b)(6)>
Sent: Sunday, December 21, 2014 9:29 AM
To: College Feedback
Subject: Re: Out of Office: Feedback on rating system

Many students with disabilities do not receive a high school diploma and are not eligible for college
In addition the access to employment is limited and this forces many students with significant disabilities to live in poverty

Melanie Tyner-Wilson
Lexington KY

Sent from my iPhone

On Dec 21, 2014, at 9:24 AM, College Feedback <collegefeedback@ed.gov> wrote:

Thank you for your email to the U.S. Department of Education. We appreciate your interest in President Obama's plan to create a better bargain for the middle class by making college more affordable.

As you know, a college degree is the best investment students can make in their own future. Education beyond high school is the key to the middle class and a highly educated workforce is vital to our economic strength and success. But despite historic investments and reforms, attending a college has never been more expensive, and the ever-growing lack of affordability is making college increasingly inaccessible for Americans. To curb rising college costs, encourage colleges to improve, and empower students and families with the information they need to make informed decisions about which college to attend, President Obama has articulated an ambitious agenda for postsecondary education: 1) Pay colleges for performance; 2) Promote innovation and competition; and 3) Ensure that student debt remains affordable.

The Department is committed to an extensive public conversation about the President's agenda to make college more affordable. Your comments will help inform the Department's work on this important effort. Visit <http://www.ed.gov/college-completion> for more information.

Thank you for your interest.

O'Bergh, Jon

From: Melanie Tyner-Wilson <(b)(6)>
Sent: Sunday, December 21, 2014 9:24 AM
To: College Feedback
Subject: Feedback on rating system

This is a question

Will there be inclusion of data on how accessible the school is for students with disability?

By this I mean both Physically and intellectually accessible

Melanie Tyner-Wilson
Lexington KY

Sent from my iPhone

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, December 22, 2014 11:07 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: How will you be able to differentiate between different programs? For example, even at a university like Harvard and University of Chicago, the majority of the students will be liberal arts graduates while a handful will be computer science majors. A blanket statement about post-graduate results without considering what the major is would obscure the distinction between different programs and result in the famous claim that the average college graduate makes \$40000 a year.

Constituency: Member of the Public

Other Constituency (if supplied):

User E-mail (if supplied):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

From: WordPress <WEB@ed.gov>
Sent: Sunday, December 21, 2014 10:15 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I am a teacher and parent, Earth Science teacher and Phi Beta Kappa liberal arts alum who is distraught about the "data-i-zation" of education. My students and colleagues are all reduced to data points under Race to the Top and other initiatives of this Administration (which I voted for twice, and which I otherwise adore). Now college selection is being subjected to the same reductionist approach. I got an excellent education at Brown— not an education degree or a science degree, but a BA in Environmental Studies. It was excellent not as evidenced by my current income, but by the whole way I live my life. That cannot be measured. I also got a great master's degree from a state university. Both degrees mean a lot to me because of my experiences with professors and other students, and because they were the right fit for me at the right time. No data could have replaced my own research. If the administration thinks so highly of the internet that it thinks that online courses are as valuable as in-person ones, then why can't it trust students to do their research and make decisions wisely?

All the emphasis on data and evaluation smacks of the influence of corporate greed: charter schools, crushing teachers and our unions, churning out workers who haven't engaged in liberal arts (no money in that) and who won't question their role in the status quo. If I sound like a conspiracy theorist, I am not, but I am a 16 year teaching veteran and this is what I see and it is heartbreaking. No one wants to talk about how poverty is the root of school and college failure; how parental income is the best predictor of socio-economic success. It's all about the economy, but not in the way that it is being portrayed.

I urge the Administration to radically scale back this scheme to rank colleges and instead spend money, staff, and effort on income inequality. You talk of not punishing schools and teachers at the K-12 levels, but believe me, it feels like punishment. In our rush to test students in everything all the time, we are forced to cut back on the unmeasurables (I had to fight to bring my students on a field trip to a National Park, because it wasn't labeled with enough state standards, for example). I beg you to talk to teachers and professors and reflect on your priorities. Think of how you yourselves were educated— what would you miss if you were a student today? I UTTERLY reject the notion that "kids are fundamentally different today"— 2 million years of evolution is not overturned by 20 years of the internet. If I judged my education by today's trends, I would say I wasted time and money and chose a low-paying career when I could have been a millionaire. Reality is I wouldn't trade it for a million dollars.

I will continue to give all my students, rich and poor, all the love, fun, experiences, and guidance and all the other unmeasurables they deserve, unless, of course, someone judges me "ineffective" due to statistics instead of comprehensive knowledge of how education happens. I hope good college professors will do the same despite your efforts!

Constituency: Other (specify below)

Other Constituency (if supplied): Parent, Science Teacher, AB Brown U '93, MEd U MA Lowell '99

User E-mail (if supplied): mortonl@chelmsford.k12.ma.us

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, December 20, 2014 6:08 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: The Federal government should not be involved in rating colleges at all. That is not the government's business. We then await the day when the ratings are politically tied and the rating politically motivated. There are many regions in our country and they are all very different. To try to rate the colleges discounts the cultural value of one institution against another by the government who cannot possibly comprehend this value. I completely reject this system and suggest you reject the President's request. This is a great waste of money and time.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, December 20, 2014 10:37 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I have lost confidence in the Department of Education and Secretary Arne Duncan. This public comment period on the proposed college rating system is just another attempt to appear as if the public will have input into the Department of Education decisions. The Department of Education has consistently ignored the opinions of students, parents, teachers, and educational researchers in their decisions (from the various Race to the Top programs, changes in regulation of teacher preparation programs, etc.). The Department of Education continues to overemphasize outcomes on standardized test scores and encourages the further privatization of education. The current plan to rate colleges and universities is yet another ill-informed decision by the Department of Education. It should be completely scrapped. However, despite the lack of support from the public (as well as colleges and universities across the country), I am sure that the Department of Education will move forward on its plan while continuing to ignore the outcry by students, parents, and educators.

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

From: Nic Voge <nvoge@Princeton.EDU>
Sent: Saturday, December 20, 2014 10:26 AM
To: College Feedback
Subject: Form did not work on 12/20 @ 10:22 am

Comments I tried to upload are as follows:

Include a measure that uses student's achievement profile (SAT, AP and other scores, GPA, etc.) to project a student's GPA in the institution. Do students outperform or under-perform, on average, in comparison to model projections? This is a good measure of institutional performance and would help, in particular, first-generation, low-income and non-traditional students who are known to under-perform at some institutions due not to academic preparation, aptitude or ability.

Include a measure of the ratio of tenured, tenure track and secure faculty positions to students. Easily achieved and a good proxy of institutional health. Would also be an effective counter-force to bloating faculty-student ratios with less qualified, part-time adjunct positions.

Since the framework fails to account for (see below) information about student experience (and other factors) that is known to be crucial because of largely methodological limitations (not because they wouldn't improve the model) the framework and rankings need to find a way to, if not address those issues, ensure that institutions do not exploit the fact that these features are not reported. One way to do this would be to include a measure of "accuracy of publicity materials". If the institutions themselves do not accurately report materials on these--and other--dimensions, how can prospective students and their families expect to make accurately informed decisions given that many relevant factors are NOT addressed in the framework?

"For many reasons --including the desire for simplicity of the ratings system, institutional autonomy and differences, and lack of shared approaches and data --it seems preferable at this time to concentrate on the core data elements addressed above and to allow institutions to provide additional information to prospective students as discussed below."

USE COMMON CORE AND OTHER TEACHER RATINGS TO NORMALIZE STUDENT PREPARATION AND PERFORMANCE TO BETTER ASCERTAIN POTENTIAL. Students' preparation can be compared more precisely now that we have these standardized teacher measures, and they can and should be used in various ways. If we believe that teachers are impactful, students whose teachers in aggregate score higher than the mean should have their scores adjusted downwards to account for this benefit and those students whose teachers score below should have their scores adjusted upwards to account for poor instruction and better reflect their true potential.

Dominic (Nic) J. Voge || Associate Director
Undergraduate Learning Program
McGraw Center for Teaching & Learning || Princeton University
(609)258-6921 || <http://www.princeton.edu/mcgraw/us/>

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, December 20, 2014 9:52 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I disagree with the proposal to use "high paying" jobs as a criteria For college ratings. Many jobs in the fields of art, education and social services do not pay well. Yet our country needs people in these jobs. A college should not be penalized because its graduates choose these fields.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: Robert M Payne <rpayne@sfasu.edu>
Sent: Friday, December 19, 2014 11:59 PM
To: College Feedback
Subject: Input on College Ratings issues

U.S. Department of Education:

Grade schools and high schools are under great pressure to pass students to the next level even if they have not learned the material. Thus a HS diploma has almost no value in the work world. Any rating/funding system that puts pressure on college teachers to pass students who have not fulfilled course requirements will similarly devalue the Bachelor's Degree and destroy the integrity of higher education.

I am a faculty member at a 4-year institution. We have a large number of low-income students who do not take our courses seriously. Others are just "attending" so they can get government money. When the difference checks are cut, they move out of the dorms.

I hope you will proceed with great caution!

**Robert Payne
Department of Mathematics and Statistics
Stephen F. Austin State University
Nacogdoches, Texas**

O'Bergh, Jon

From: Peter McGehee <(b)(6)>
Sent: Friday, December 19, 2014 8:53 PM
To: College Feedback
Subject: College effectiveness index

In agreeing that an indexed college effectiveness report may be of inestimable value to a prospective college student, and the students parents, it might also be done in such a way as to be biased and misleading.

Rating and indexing the effectiveness of a U.S. college is, as I'm sure you have already discovered, a daunting task fraught with potential mines and disasters. First, who should determine the rating issues; secondly, how are you going to determine and assign rating values; (consider that self-reporting by colleges will be highly prone to errors; someone will have to audit the college books to determine accuracy). Third, and perhaps most important, what is the expected value (knowledge) that a prospective student would gain from the indexed report. In other words, what is the goal of the report?

One way to measure educational effectiveness is cost vs. income, (project current income over 5 years vs. the cost of attaining the degree, to produce a ratio). Although certainly a valid measure, it ignores the fact that many people do not attend college to make a large income; some attend college to realize careers that are of deemed highly attractive and interesting. It seems then, that the college rating system must consider, the major (or some common list of majors) and the number of students who obtain employment (self or otherwise) in a given major, and, again, the income realized from this employment vs. educational cost.

One might also consider how long it takes a graduated (diplomaed) student to obtain full, gainful employment. This, along with giving the related major, would provide extremely useful information.

Lastly, one must consider majors that take more than four years to complete. In today's employment environment, many majors either take more than four years to complete (architecture, medicine, etc.) or do not provide a reasonable (living) income without continuing on through some graduate work, perhaps resulting in a masters degree.

It can be anticipated that a report containing the information above would be time consuming and costly, but to do otherwise might result in a report of very marginal usefulness.

Peter McGehee
Cypress, TX

(b)(6)

O'Bergh, Jon

From: Scott Seramur <(b)(6)>
Sent: Friday, December 19, 2014 6:07 PM
To: College Feedback
Subject: Comment on New System of College Ratings

As a college student who is going on attending a seventh university in route to obtaining a bachelors degree, I feel as I am over qualified in the matter of what makes a school excellent. Although the ability to obtain employment after graduation is important, I think the most important thing a student can gain from education is not solely a job, but rather the ability to critically think. With that being said, I think DOE ought to offer exit examinations to gauge comprehension outside of university. Such a device would serve the nation by allow the government to understand where the talent is located. Utilizing talent ought to be in the interest of National Security. We ought to do away with corruption and connections where employment is concerned, such things would only work to drive up the cost of education; whereby such a marker becomes a variable, based upon how much institutions can corrupt hiring practices. I'd rather employee be a smart person who has demonstrated comprehension retention and merits a degree than a stupid one who is well connected and the ability to use rote memory. The post educational exam ought to include concrete and abstract problem solving as well as other markers of intelligence.

Let us not cede Americas place in the world by allowing the educational environment to degrade with a poorly devised ranking system.

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Scott Seramur
(b)(6)
Mobile: (b)(6)
Direct: (b)(6)

"Understanding that sustainability is the ultimate issue will bring America face to face with the political challenge of forging a sustainable society during the next few decades. It is a challenge America can meet if we have the leadership and political will to do so." Gov. Nelson

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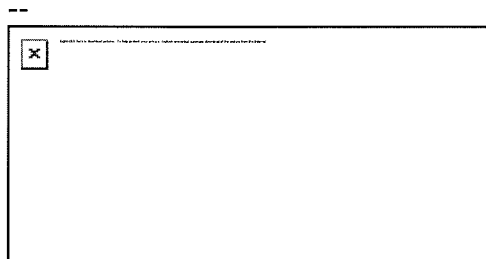
O'Bergh, Jon

From: Steve Pew <(b)(6)>
Sent: Friday, December 19, 2014 3:28 PM
To: College Feedback; Steve Pew
Subject: How to offer comment on the College Ratings proposal

Difficult to find the proposal even with Google. Difficult to find a place to make comment.

Please advise
Thanks

Stephen Pew, Ph.D.



O'Bergh, Jon

From: Borrero, Ruben <Ruben.Borrero@isac.illinois.gov>
Sent: Friday, December 19, 2014 2:57 PM
To: College Feedback
Subject: College Rating Framework

Hi,

I was wondering if it was possible to obtain data that assess college completion by different EFC brackets? It is a known fact that low-income students have a harder time completing college. Perhaps if the Department of Education creates some sort of metric to determine how well or how bad institutions are performing at this level, it will encourage those institutions that are not doing well in this category to allocate more resources towards low-income students.

Great initiative! Hope to hear from you guys soon.

Ruben A. Borrero
Outreach and Professional Development Specialist
800.899.4722, ext. 3838
Ruben.Borrero@isac.illinois.gov

O'Bergh, Jon

From: Carter Delloro <delloro@oxy.edu>
Sent: Friday, December 19, 2014 2:36 PM
To: College Feedback
Subject: College grading metrics

Hi there,

I'm in Admission at Occidental College, and worked in Admissions at Pomona College before this. I wanted to say that I applaud the effort to provide an alternative ranking system to the US News & World Report behemoth that has been shifting priorities in the world of admissions for years. As long as your ranking system doesn't include the SATs/ACTs/GPA of incoming students, I think it will be a much better system than the current ones.

One thing I wanted to share is with regards to the inclusion of first-generation students in your calculations. I've learned that different colleges measure that differently. Pomona, for example, counts a first-generation student as anyone with one parent who never attended a four-year school (this led to some strange students who were first-generation legacies...). Occidental only counts students for whom neither parent attended a four-year school.

I would just caution you to be clear on collecting this data about exactly what you're getting, so that it is as accurate as possible.

I hope that helps! Best of luck,

Carter

--

Carter Delloro
Assistant Dean of Admission
Occidental College
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323-259-2700

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Check out student perspectives: oxy.edu/campus-conversations/student-voices

O'Bergh, Jon

From: Brianna Moore <bmoore@cca.edu>
Sent: Friday, December 19, 2014 2:08 PM
To: College Feedback
Subject: PIRS Question on EFC Gap

Hello,

We have reviewed the recently released proposal on the new rating system for colleges. It's very impressive and encouraging to see all the work that has gone into considering more robust metrics. Since feedback is being considered I was hoping to clarify some of the definitions of the potential metrics presented:

Expected Family Contribution (EFC) Gap:

In the USDOE summary it defines the metric as:

" as the average difference between some focal EFC level and each student's individual EFC (with negative values treated as zero). This measure would give institutions credit for enrolling students from lower family income backgrounds, but avoids creating sharply different incentives to enroll students from similar family circumstances."

This metric seems to be associated with *access*.

However an Inside Higher Ed article here mentions another potential metric being considered as "Family Contribution":

<https://www.insidehighered.com/news/2014/12/19/education-department-releases-draft-framework-its-college-ratings-plan>

Defined as:

"a measure of the gap between the Expected Family Contribution (EFC) and total cost of attendance not covered by financial aid"

This metric seems to be associated with *affordability* and an important feature to consider, but I don't see it mentioned in the <http://www2.ed.gov/documents/college-affordability/framework-invitation-comment.pdf> document.

Would it be possible for you or someone else on your team to confirm if the second metric labeled "Family Contribution" is potentially also being considered for PIRS? It almost seems like the definitions are switched, the second sounds like the EFC Gap and the first sounds like Family Contribution.

Thank you and Happy Holidays!
Brianna

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Brianna Moore-Trieu, Ph D.
Director of Institutional Research

California College of the Arts
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San Francisco, CA 94107
E: bmoore@cca.edu W: (415) -703 - 9522

O'Bergh, Jon

From: RUSHING Claudette <Claudette.Rushing@ode.state.or.us>
Sent: Friday, December 19, 2014 1:00 PM
To: College Feedback
Subject: College feedback

Hello,

Per your request for commentary, please view the following. Also, please note the online form provided by ED.gov is not working at this time. As such here are my comments for your proposal:

Using Pell grant data as a metric for low income student enrollment is not sufficient or informative, as many low income individuals do not receive Pell grants. All during college I was below the federal poverty line, yet I only qualified for a Pell grant during my first year of community college. There are many working poor students in this country, who need a full time job for insurance purposes and who are therefore excluded from Pell grant eligibility. Using the projected family contribution data would look only at familiar wealth rather than individual ability to pay (i.e. even though a student has family with a high income, that family may refuse to help them pay for college), but that data would still be a more reliable indicator of low income students than Pell grant data.

Next, the proposal does not take into account the actual employability or future salary of student graduates. This is a very important factor when students determine which school to attend, as most students will leave higher education with high debt levels and need to know if they can earn money to repay any debt which they incur. There is currently no national data or unbiased and accurate source of this information for consumers to review. Without knowing the likelihood of obtaining employment and the projected potential salary an education may afford, student consumers have no idea if the college investment/attendance is a wise one or not. The Department is therefore respectfully asked to include a measure related to the percentage of graduated students who are employed full time within 6 months of graduation, and to report the associated salaries of such students in comparison to their overall student debt.

College spending is devastating generations of Americans and harming our national economy. Universities need to be transparent in their overall costs prior to student enrollment. Students need to be able to compare programs total costs, fees, and projected debt to salary ratios in order to make informed decisions about this major purchase which will impact the rest of their lives.

Please help to this end in any way that you can.

thank you,

(b)(6)

Legal and Dispute Resolution Specialist
Oregon Department of Education
Student Services- Office of Learning
503-947-5689

From: Daniel Nichols - Stem Jobs <d.nichols@stemjobs.com>
Sent: Friday, December 19, 2014 12:54 PM
To: College Feedback
Subject: Recommendations for an effective ratings program

Summarizing our recommendations

1. **Address the growing gap between secondary and post-secondary education:** College relationships with secondary academic institutions has direct impact on student degree selection, preparation and successful completion.
2. **Address the long-term gap between post-secondary institutions and employers:** College career offices face the steepest challenge on campus when it comes to fighting for budget and resource allocation. Collecting placement rates should help, but colleges are currently ill equipped to bridge the employment gap -- which is just as much the fault of employers who rarely engage with colleges in curriculum development that connects degree programs to jobs.
3. **Balance high growth against high demand occupations with an eye on workforce projections:** Preparing students for jobs that pay well today is by no means a solid workforce development strategy. Entrepreneurism is left out, skilled trades that are changing dramatically are left out, and emerging occupations and skill requirements are left out.
4. **Reward success while empowering the whole system:** Higher education is still a privilege and not a right ... it is an investment and should be treated as such. Yet it is also a foundational underpinning of an advanced society and the key to economic and cultural advancement and innovation. Narrowing the field of options on a macro scale is likely to bring greater harm to an education system already under fire rather than broadening access. Which leads to our final point:
5. **Recognizing and rewarding the unique mission of institutions through the sharing of best practices:** The competitive nature and limited scope of the measures presented is a fundamental and dynamic shift in American Higher Education. Accountability and outcomes are undeniably needed, but our analysis suggests that the trajectory of the current standards (barebones as they are) aims to undercut the ability of academic institutions to offer unique opportunities, to test and develop innovative approaches to education, and ultimately to improve the targeted measures in any meaningful way.

Daniel M. Nichols
President,
STEMJOBS
d.nichols@stemjobs.com
[@stem_jobs](https://twitter.com/stem_jobs)
stemjobs.com

#DOWHATYOULOVE



O'Bergh, Jon

From: Michael Sexton <(b)(6)>
Sent: Friday, December 19, 2014 12:43 PM
To: College Feedback
Subject: Metrics for new Rating

Colleagues - If we are serious about college completion rate metrics, we owe it to the public to get away from the thought that a six-year grad rate is the norm that should be expected and rewarded. I know it has become the "go to" metric but, no parents I know plan on paying for six years of each child's college education, You have got to include the four year graduation rate data and to count it as a huge positive in this endeavor. Thx.

Mike

From: Norbert Johnson <(b)(6)>
Sent: Friday, December 19, 2014 12:27 PM
To: College Feedback
Subject: Comment on New System of College Rating

STATEMENT: None of your criteria for Rating Colleges is valid for anything except eligibility for FUNDING on the part of the Federal Government. It [is not] about the educational process [or] the the applicability of the education to employment status upon graduation.

A College Education should not be a prerequisite to employment. That is the realm of Technical and Business Institutes.

The ability of the student to receive a Federal Grant should be based in sole upon academic preparation and a testing module that is predictive of success. There must first be the ABILITY, DESIRE, and the psychological capacity to COMPLETE the education.

An Educational Institution, even if accredited, that fails to predict the field of employment outlook for each program offered, on at least a 5 year projection, is tantamount to a Diploma Mill. Wherein, the degree conferred is of no consequence or value to the Graduate and serves only to elicit federal funding for the interests of the Institution, and not to the economic, educational, or psychological value to the student. Therefore, the Student pays for a worthless degree through a mortgage on his person and is subject to indentured servitude for half is his/her working life.

This "Rating System" must be clearly identified and articulated to the public, that it is a rating system [only] for the purpose of federal funding of grants and loans [and] not to determine a quality of education and/or a guarantee of employment [in the field] of studies indicated by the degree.

In 1971, I paid for my College education based upon 9.38 hours of work at minimum wage. The same degree sought today requires 18.62 hours of work at minimum wage at the same type of institution... Community Colleges. By 1974, the per course academic requirements were cut by 1/3rd to allow for under developed (academically speaking) persons to pass the course... to ensure that Federal Financial Aid Eligibility remained intact. By 1978, it was again reduced by 1/3rd as well as a substantial increase in "Remedial Courses" to ensure Federal Financial Aid Eligibility. This does both a disservice to the individual, but most importantly, to the graduates in that their Degree of training is lessor than their predecessors. Again, this conflates the standards of education, but because the Accreditation Commissions continue to allow such based on the bottom line of institutional financial stability, your proposed model of Rating would serve only to support indentured servitude of the graduate and not validate a quality of education.

If the purpose of this exercise is to ensure funding for the institution... it is then flawed at its inception and serves only to support a decaying system of academia. If it is designed to validate funding for the benefit of the Student's success as well as employability... it is again flawed. And finally, if it is designed to protect the Tax Payers from unqualified educational activities of a college, and as a cost savings, or cost effective approach to federal funds... it is not only flawed but deplorable and continues the accredited Diploma Mill concept.

Who am I to make such a claim? I entered College in 1970. By 1973 I was taking as much as 40 college credits at an accredited Community College in one college term. I held a 3.39 GPA for that term as well as held a job. I also attended 3 separate colleges at the same time, one University, one College, and one Community College...

and still maintained an overall GPA of 3.25. I graduated high school with a 2.25 GPA from a California high school that was considered [marginal]. Only one degree earned out of 5 actually prepared me for gainful employment in that field. All the institutions were regionally accredited. I also served on the Educational Policy & Curriculum Committee as well as the Scholastic Committee of one of the Colleges, as a student.

I found no appreciable difference in quality of education from the 10 accredited institutions and the 3 non accredited institutions, except the non accredited ones required substantially more work.

Respectfully, Norbert Johnson

O'Bergh, Jon

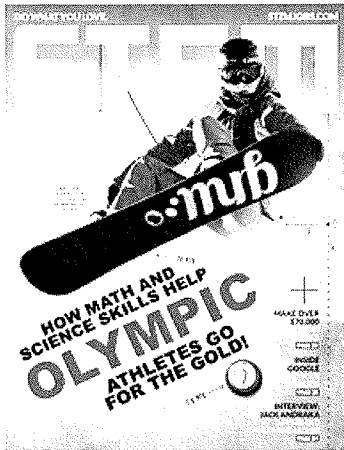
From: Daniel Nichols - Stem Jobs <d.nichols@stemjobs.com>
Sent: Friday, December 19, 2014 12:02 PM
To: College Feedback
Subject: Feedback into college outcome ratings

Greetings,

As a publisher of a national high school publication, we have significant interest in helping students and parents connect their education choices with career outcomes. We'd welcome the opportunity to interview you and assist in collecting feedback from our students around the measures and information they are interested in - in regard to greater transparency in college performance ratings. Our next publication deadline is January 25.

Daniel M. Nichols
STEMJOBS
d.nichols@stemjobs.com
[@stem_jobs](https://twitter.com/stem_jobs)
stemjobs.com

#DOWHATYOULOVE



O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, December 19, 2014 11:19 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: How will the new System of College Ratings impact decision Making of accreditation teams should a college receive a low Performance rating?

Constituency: Higher Ed Association/Organization

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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O'Bergh, Jon

From: Megha Manish <(b)(6)>
Sent: Friday, December 19, 2014 10:10 AM
To: College Feedback
Subject: feedback

thumbs up to this initiative by President Obama. this will definitely help parents like me (i have 2 boys 12 and 9) to decide for college when they are ready.

thanks!

Manish

O'Bergh, Jon

From: Gary Corrigan <gary_corrigan@owens.edu>
Sent: Friday, December 19, 2014 8:57 AM
To: College Feedback
Subject: Comments on Quality

The socio-economic traits of the individuals are being misused to evaluate the quality of an institution's quality. Measure quality as "fit for use" as is done in other industries such as the auto industry. The measurements under consideration do a disservice to those of low/limited income and mobility. It also makes it easier to discriminate against others who through many uncontrollable circumstances will not be able to choose institutions of rank based on the metrics being considered. The auto industry and various consumer publications have been evaluating quality in their market and do survive by selling bad products. They also do not ask the government to subsidize and encourage people to take out loans for high priced vehicles under assumption that the more you pay the better the vehicle. "Fit for Use" is a realistic measurement for most educational offerings. The statistical few exceptions of excellence will be identified by their persistence to find a way to enroll in the currently "high ranked " educational institutions. The considered metrics are a travesty that will only promote more economic segregation within our nation. Keep the Pell Grants and privatize the loans .Make institutions and banks accountable for all loans for education as they do for autos. Let the students vote with their feet which institution is best for their needs. Trust the collective wisdom of people to make good decisions.

Gary J. Corrigan Ph.D.
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Workforce Services
Owens Community College
1724 Indian Wood Circle
Maumee, Ohio 43537

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Fax 567-661-7662
E-mail gary_corrigan@owens.edu

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, December 22, 2014 3:49 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: As you rank the two year colleges, consider the number of developmental education and second language students that these colleges admit. These two programs extend the length of time it takes for students to graduate, sometimes by up to two years as returning students, who haven't had math or writing in 20 years, start at the bottom of the math classes and slowly work their way up through what may be a year of developmental math and then take on the required year of pre-college math and college math. The same can be said for college writing. In some colleges, they can't move on until they have completed these developmental classes. The four year colleges and universities have all but ended their developmental education programs and turned the students over to the two year schools, thus increasing the burden on many two year colleges to carry these classes. I know some schools have student populations wherein at least 60% of their students take one or more developmental education class.

Constituency: University Staff/Faculty

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: Woolf Betsy <bfwoolf@woolfcollegeconsulting.com>
Sent: Monday, December 22, 2014 9:52 PM
To: College Feedback
Subject: College ratings

As with everything else, no matter what you do, ratings are suspect. Colleges should not be "rated," because people spend too much time looking at where colleges appear on lists and not at what is important - academics and whether a student is a good fit for a particular college and affordability. And we know that the usual suspects will sit in the top group - Ivy League and other schools that accept a small number of students, which then increases the application and denial frenzy.

There are a lot of great schools out there that most people don't know about. I would prefer to see the Department of Education spend its resources on getting the word out about these schools rather than waste taxpayer money on yet another list. Oh, and in figuring out how to bring down the cost of college and how to give middle class and upper middle class families the same consideration in affording college as is given to low income students.

Betsy F. Woolf
Certified Educational Planner
Woolf College Consulting
STAND OUT TO GET IN ®
College & Graduate School Admissions Planning www.woolfcollegeconsulting.com t 914.381.6338 f 413.803.7521
bfwoolf@woolfcollegeconsulting.com

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, December 22, 2014 7:58 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Just a suggestion in regards to the rating levels: assign five rating levels as: A for high-performing; B, C, D and F for extremely low-performing colleges/universities.
This rating system may be easier for parents and students to understand.

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: abrauburger@southseattle.edu
Sent: Monday, December 22, 2014 11:15 PM
To: College Feedback
Subject: Certificate completion

As the Assessment and Continuous Improvement Coordinator at South Seattle College, I'd like to provide my comment that Certificate Completion and Intention Achievement are especially important to our Strategic Plan at my institution. Many students attend our college seeking specific certificates such as Composites Technician in order to earn local employment from Boeing. We've received high accolades from Boeing on the level of readiness of our students but they don't necessarily show up in completion reports because they did not earn an AA degree. Furthermore, we have many students who attend our Continuing Education and our Language courses, as well as our Wine Pairing and Pastry Arts courses, simply for personal improvement. I'd like to see the Intention Achievement from these students measured as an indicator of our success.

Thank you for your consideration,

Analea

Please forgive my brevity as this was written using my iPhone

From: Tom Costello <(b)(6)>
Sent: Tuesday, December 23, 2014 12:41 PM
To: College Feedback
Subject: Public Comments -- College Ratings and Paying for Performance Initiative

Re: Public Comments -- College Ratings and Paying for Performance

As a college instructor both at on-ground and online colleges for the past ten years -- I offer the following comments regarding the U.S. Department of Education's "college ratings and paying for performance" initiative.

It has been my experience that college is presented more as a rite of passage or entitlement rather than a privilege that needs to be **earned**. For example, over the years I have painfully witnessed many students who are woefully ill-prepared for the academic rigor of college and shock at the huge amount of debt they have incurred as they drop out due to their unpreparedness and false expectations given to them by admissions officials. My point: Few college admission officers really "vet" these students appropriately and "advise" them of the rigors in advance, because of the pressure placed on them by the college to meet certain numerical "goals" similar to military recruiters. Suggestion: A metric needs to measure recruiting with retention to truly see the consequences of this conspicuously coincidental practice used by most colleges.

In order to level the playing field, all colleges and universities should be placed into a three tiered rating system, based upon socio- economic and "academic" demographics. For if, colleges, universities are to be ranked fairly with the "cards they have been dealt," so to speak, an appropriately designed rating system must reflect these realities. I suggest that you create a "tiered" system. The first tier would be the most competitive schools (e.g., Ivy League and other prestigious colleges and universities that admit the best and brightest); the second-tier are the above-average private and state schools; and third tier are all of the "open admissions" colleges enrolling the least academically prepared for college.

Although open enrollment may sound egalitarian; however, it is the road to academic perdition for many educationally unprepared students, particularly those from economically and demographically challenged areas in our nation.

Suggestion: If the prospective student has a poor academic track record in high school; a low ACT or SAT score, or no score, I suggest the first critical step involves which particular academic area(s) needs to be developed prior to formal college admission. This involves admission to be conditioned on two requirements: The completion of a uniform and nationally approved "pre-college" screening assessment. This assessment would clearly measure academically deficient areas that need to be improved. For example, the assessment would include several comprehensive reading questions asking for the "main idea" to be provided in one sentence, written out – no multiple choice; several open-ended essay questions requiring at least a one page hand-written response; several inductive and deductive reasoning questions; several basic math questions, including several word-problems measuring basic knowledge of addition, subtraction, division, multiplication, fractions, decimals, and percentages. Schools that evince the highest percentage rates of successfully moving from remedial course program through graduation should be tracked and given incentive (bonus) grants to continue these most critically needed programs if ever the low-income and academically disadvantaged will ever achieve any educational success and hopefully successful employment and future.

Additionally, your proposed rating system must also factor in the realities of the 21st century and beyond. Those colleges and universities that offer most robust and successful cooperative-education, internship programs, and apprenticeships by partnering with the many and varied business and government sectors should be given specially allocated “special grants” to encourage a “new culture and generation of student-workers.” For example, in an article written by Lee (2014), highlighting the need for highly trained (educated) workers ready to hit the road running when they complete their college education, she posits,

“Automotive apprenticeships are a new concept in the U.S. and gaining attention for their ability to solve a fundamental problem of the 21st century: how to equip unskilled labor for an increasingly technical and changing manufacturing environment. In Germany and other European countries, apprenticeship programs are common and fill a vital niche in the labor market. Here in the States however, the concept of the paid student worker who competes to study and train onsite has fallen off. Only about five percent of workers enroll in apprenticeship programs, compared to a whopping 60 percent in Germany... It is unique to have an associate’s degree in a hands-on training program in a company. Basically, they don’t go to the campus of Chattanooga Community College,” said Subasi. “They all stay at the plant and the teachers [come] to us.” The students earn a monthly stipend during the three years of training, and if they pass the final testing, are offered a job upon completion that comes with benefits and a competitive salary.” (See more at:

<http://www.triplepundit.com/2014/10/volkswagen-launches-new-auto-apprenticeship-program/>

Further, your ratings should include a “truth in accurate crime reporting” metric. This metric would measure would compare the results of Student Victim Surveys (similar to National Crime Victimization Survey) in which student crimes actually reported to campus police would be compared to what the college actually reports each year. Additionally, a metric to track what measures that college took against students perpetrating these crimes, especially rape! These “dark crimes” go under-reported at the expense of the students and their families. Take the gloves off; yes, let this reporting system be the “rating police” to correct the dismal performance that colleges have evinced for decades in this area. A well designed “rating system” might assist in preventing unnecessary victimization and let parents KNOW what the real crime picture is when considering a certain college for their child – wouldn’t you want to know?

One of the most important outcomes to measure is to what extent, “Johnny can or cannot read, write, and think .” My experience as an educator is that TOO many students are “awarded” a college degree – despite the fact they can barely read or write. As a national accreditation evaluator this issue comes up time and time again when employers are surveyed an many opine that “college graduates” are still unable to write clearly and coherently. I see the same in essay exams constantly, even with students that are in their last year of a four year degree. In large part, this issue is attributable to the fact that many colleges now hire adjuncts at very low pay with no benefits, or use graduate or teaching assistants. These instructors are then “rated” on “student surveys.” These surveys are used by the colleges to evaluate the instructors. This rather perverted practice places many instructors in the tenuous position of merely “giving” undeserved grades to students and dumbing down the course material so that all students do well and they in turn are given favorable ratings by the students. This practice perpetuates the academic mediocrity of colleges producing graduates with an academic equivalent of a fourth or fifth grade student. You should read some of these essays. Suggestion: To clearly measure the educational “outcome” of college graduates offer incentive grants to those colleges that require students to pass a “certification” exam in their respective disciplines before they are granted a college “degree,” similar to what

accounting managers take for their CPA, or IT students with the various certifications they need (Microsoft Certification, A++, C ...) .Part of the certification process would measure reading comprehension, preparing written response to open-ended subject matter questions relative to their major math, and logical reasoning questions. This effort might give employers more faith and assurance in hiring a “college graduate!”

Yes, I understand that many students still think that the American Dream is to simply get traditional four-year degree, but this mindset and “culture” has in large part been promoted by “educational and career” counselors and college admissions erroneously and improvidently. These tactics do not address what colleges really need to do meet the future needs of our nation. Your present rating system merely rates and rewards this same old and ineffective culture perpetuating many consequences for the most vulnerable in our society – the young -- who trust what these educational institutions until they soon discover they are not prepared (academically) for college, or are saddled with a truly irrational-based college loan for “services” rendered ---!

You might find the following article, “A 2% solution to a host of college problems” by editorial writer, Kevin O’Brien, (Cleveland Plain Dealer – August 14, 2104), interesting with regards to “thinking” about rating colleges and how students are often students are lulled into an “American Nightmare” when they graduate with no truly needed skills and a huge debt:

“[The] contract shouldn't be between the future employer and the student. It should be between the college and the student.

The incoming freshman would agree to repay the college for his or her higher education at a fixed percentage of the student's gross earnings for a fixed number of years. Say, 2 percent of income for 25 years.

The problem of crushing student debt is immediately solved. When the student graduates and gets that first job at what should be the lowest earning level of his professional life, he will also face the lowest college repayment level: 2 percent of very little is very, very little. Twenty-five years later, when the former student is the executive VP of a multinational company, 2 percent of a whole lot will still be a very reasonable price for the happy graduate to pay and a tidy raw-dollar sum indeed for Dear Old State U.

Starting with his first paycheck, the graduate can use his earnings for things other than debt service. He can buy a reliable car, begin investing in a retirement plan, put money aside for a house, go on vacation, etc. College debt would not be the impediment it is today to getting married and starting a family.

The college, meanwhile, finally assumes some accountability.

First, the college has to choose wisely. If it contracts with marginal students who lack direction or motivation, it's likely to lose money on them. Then, the college has to make sure students don't lose their way during school. It has to make sure they learn truly useful things well. As graduation nears, the college is motivated to help the student land the best possible job at the best possible pay. It may even find ways to support the employed graduate with information and connections that make him a better (and better-paid) employee.

Failure to do such things will reduce the return on the college's investment of time and effort in the student.

Now expand those incentives across a whole system of higher education and a whole system of entry-level employment.

Colleges and universities would be quick to eliminate courses, majors, even entire academic departments that offered insufficient return on investment. Some colleges and universities, finding themselves unable to compete,

would disappear. That is not a bad thing. America is way over-college, hence the expensive, wasteful competition on creature comforts to lure freshmen, since the quality of undergraduate education is pretty much the same everywhere.

Businesses, meanwhile, could no longer use colleges the way they do today: as talent screeners performing all sorts of interviewing, testing, ranking and weeding out at no charge to students' prospective employers but at considerable cost to potential job applicants and taxpayers.

Once colleges eliminate departments and majors that don't move graduates into jobs worth a college education, businesses will recover the skills of screening their own applicants. That would put an end to Americans' patently ludicrous notion that every job more exalted than fast-food worker requires a degree.

As the number of college-educated people available for work as retail salespeople and managers, fashion designers, bankers, clerks, secretaries, journalists (!) dwindles, those jobs would by no means go empty. They would be filled, as they used to be, by high school graduates free to give any career path a no-obligation try. If one thing doesn't work out, they'll try another, without the financial pressure of having mortgaged their lives to a college.

If the college-equals-earnings crowd is right, they should see no risk whatsoever in adopting my 2 percent solution. The marketplace should prove them right and make colleges wealthier than ever. But they'd fight it tooth and nail because they know for a lot of youngsters, college is a false promise.

Don't get me wrong: I'm not anti-college; I'm anti-racketeering. If it were up to me, we'd pull the whole money-burning structure down and replace it with something efficient and useful.

But it's not up to me. It's up to colleges that are rolling in dough and yet are absolved of all responsibility when vast numbers of graduates never get jobs related to their academic majors and take decades to get out of debt."

These issues are the real "elephant" in the room that need to be addressed if this "rating" system is to have any efficacy in ensuring that low-income, first-generation, and otherwise demographically and educationally disadvantaged and challenged students will ever have a chance of securing a college education and meaningful employment. I suggest that it is also time to include some of the realities of the 21st Century and beyond in terms of how colleges actually match the students' preparedness for college before "admission," and the probabilities of actually getting meaningful employment vis-à-vis the irrational and mysteriously high cost all of us pay to the few and privileged in academia for this "service."

O'Bergh, Jon

From: Quigley, Charlotte <CQuigley@middlesexcc.edu>
Sent: Tuesday, December 23, 2014 10:17 AM
To: College Feedback
Subject: Ratings: Labor Market Success metric in proposed Higher Education rating system

Without any widespread mechanism for readily tracking student/graduate employment, this metric will either rely on student self-report or require an onerous labor/staffing hit. In general, community college career center staffing levels are minimal. If there were a readily available, commonly utilized and reliable resource for verifying employment, something similar to the transfer clearinghouse for students transferring from 2-year to 4-year universities/colleges, then college would be able to provide solid and actual verifiable data. It is important to have the infrastructure in place to allow for and support compliance.

Best wishes,

Charlotte Quigley

Manager, Career Services
Middlesex County College
Edison, NJ 08818
732-906-2595

"Be kinder than necessary, for everyone you meet is fighting some kind of battle."

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Tuesday, December 23, 2014 5:14 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: There needs to be more oversight of proprietary schools that have a large proportion of low income, minority students. These schools seem to focus their marketing heavily towards these student. Their cost are sometimes higher than public universities and the quality does not seem to be on par with other universities. They saddle students with student loans they can not afford and a large number of the students do not complete their degree. This leads to a disillusionment of education's value. Quite often they attract students who are coming from lower performing school systems.
The availability of funds given to these schools should be based on the outcomes of the students with regards to completion of studies, actual earnings of the students, affordability, and quality of the staff.

Constituency: Member of the Public

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Wednesday, December 24, 2014 1:05 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: It is nearly impossible for 4 year, degree granting institutions to battle the legions of students graduating from High School that cannot read and write at their grade level. They are not college ready. The failures of "All Children Left Behind" have proliferated and created an environment where institutions of higher learning are being asked to make up for the failures of the high school and elementary schools. These failures impact minority, poor students, and future first-generation college students the most. These students have the highest college drop-out rates and are the largest loan-carrying students. Incentivising the higher ed process will not help. Most schools that are doing the yeoman's work of developing these students that are not college ready are not being given the resources. Instead of incentivizing the higher education system and propagating a system that promotes failure at the lower levels in a "ot;They'll learn it in college system" – focus on the overwhelmed, underpaid, overworked, under-performing high schools. THIS will fix the completion and debt problems persistent in higher education.

DATA: First-generation college students are ill-prepared for college-level work. Most are not even ready to take on modest internships. Lack the basic skills to read, write, count change, post info on the web, connect to the internet, develop a website, critical think, solve problems, and navigate without a GPS.

Constituency: Please Select...

Other Constituency (*if supplied*):

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, December 27, 2014 7:02 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Another metric to include would be about students with disabilities metric. It should rate the following items:

- (A) Percentage of students that have self disclosed to the university that they have a disability.
- (B) Percentage students with disabilities that seek supports from the students with disabilities office.
- (C) Percentage of professors/faculty/adjuncts that are considered to be friendly towards students with disabilities.
- (D) Accommodations offered to students
- (E) Ease of process used to meet determination of services criteria.
- (F) Criteria used for determination of services and having a transparent system in place to help get services.
- (G) Appeal and complaint process transparency that is straight forward and easy to understand.
- (H) Appeal and complaint ratings that measure: (A) Application process (B) determination of services success/failure (C) student ratings for professors (D) Accommodation type, appeals, complaints, and ease of access.

Constituency: Other (specify below)

Other Constituency (if supplied): Student/Disability Compliance/Law Advocate

User E-mail (if supplied):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: Rosemary French <(b)(6)>
Sent: Saturday, December 27, 2014 6:36 PM
To: College Feedback
Subject: FW: college tution

From: (b)(6)
To: collegefeedback@edu.gov
Subject: college tution
Date: Sat, 27 Dec 2014 23:31:59 +0000

I believe that financial aid should be base on the labor department 's report on new jobs that are created yearly. If there are no new jobs created in a career field per year than their should be no financial aid made available for students chosing to enter that career field or college program at entry level. I feel that each program of study should be at least 50 % of new jobs created per year for up coming graduates with degrees.

Thank you

O'Bergh, Jon

From: Christopher Anderson <(b)(6)>
Sent: Saturday, December 27, 2014 12:49 AM
To: College Feedback
Subject: Comment on New System of College Ratings

To whom it may concern-

My feedback on the new college metrics as follows:

- 1) Grouping by more than just 2- and 4- year schools is important. Selectivity plays a major role in a number of those factors, and there is tremendous value in having colleges with different ranges of selectivity available.
- 2) Aggregating the values, and providing clear information about how the aggregation will work in advance is also critical. For the government to use this metric in any decisions, you will ultimately want to simplify the data by aggregation.

It would seem quite wise to prioritize employability and/or graduate school as variables to weight more heavily in the aggregate. This is the ROI in which students, parents, and government are highly interested.

I urge you to handle factors like completion and retention with extreme caution. Ultimately, grouping the schools and making sure that data are on common scales and are validated should solve many potential problems. However, in my wide experience, some schools are currently gaming retention stats in order to receive more approval from various agencies, and to suck up financial aid, regardless of whether it does the student any good. These schools are reprehensible as civic institutions, employers, and anything else. I hope you will be extremely cautious about rewarding them for their "high retentions." It is very easy to persuade a student to stay in college by offering them easy grades, coddling them, and offering extra amenities that do the opposite of preparing them for future work or graduate education.

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Friday, December 26, 2014 12:38 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: You say learning outcomes are central to understanding the value of an education "but vary widely across programs and institutions and are communicated in many different ways." OK, that's true, but it doesn't mean that student learning outcomes couldn't effectively be included in a college ratings framework.

How about asking colleges to report whether or not the college is measuring student learning outcomes? I'd like to see the Education Department provide some leadership communicating about student learning. It might be useful to compare the colleges who are actually keeping track of student learning outcomes to the ones that aren't. Of course, it would be important to define, at least, generally how the institution was tracking the student learning outcomes. A few simple characteristics would be good for a start. For instance, are student learning outcomes measured in all courses or just some? how often are student learning outcomes measured? what kinds of tools or systems is the college using to measure student learning outcomes? Asking the colleges these simple questions would provide a great start to understanding that which is, in the departments words, "central to understanding the value of an education."

The Ed Dept said that it planned to primarily rely on data sources to which it already had access. That makes sense if you're trying to keep things easy to do, but it's not likely to produce much in the way of new and possibly game changing information. If the Ed Dept really wants to expand the opportunity for more students to enroll and succeed in college, especially low-income and underrepresented students, it needs to require reports on measures of student learning sooner rather than later.

Constituency: Other (specify below)

Other Constituency (if supplied): Assessment Consultant

User E-mail (if supplied):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: Don Philabaum <don@internetstrategiesgroup.com>
Sent: Thursday, December 25, 2014 8:23 PM
To: College Feedback
Subject: College ratings feedback - suggestions focused on ...substantial employment

Hello!

I am particularly interested in helping any way I can in ..

Labor Market Success - gainful employment - substantial employment.

Colleges need to "reboot" their campus cultures to focus on careers. Career centers are no more than a campus club that students don't use. In 2010 - 2012 college career centers averaged a 16% budget cut. The average private college will spend \$3,000 to recruit a student and less than \$100 over 4 years to provide career support.

This is one of the MOST important areas to fix all areas. Students that are focused on careers, that are connected to alumni, whose professors show them HOW they will use the knowledge they are learning in their careers, will not only stay in college, but graduate on time and with jobs.

Ninety-five percent of colleges are not only ignoring the issues grads face in this new economy but worse, they are doing nothing with the increasing evidence that black graduates are faring far worse. Something needs to be done to ENCOURAGE colleges to make this a priority.

If you need someone to provide feedback in this area, I'd love to help. My firm has provided free career curriculum to over 1000 career centers because administrators do not provide a budget for our services. I've written a dozen white papers, 1/2 dozen books and have held over 200 webinars on this and related topics with higher education professionals and the message is being heard.... but management is doing nothing about it.

My blog <http://www.careercenterstrategy.com>
Linkedin: <https://www.linkedin.com/in/donphilabaum>
Books:

Change It! Create a Career Center College Culture
The Unemployed Grad, And What Parents Can Do About It!
http://www.amazon.com/s/ref=nb_sb_noss_1?url=search-alias%3Daps&field-keywords=don+philabaum

Don

800-849-1762
(b)(6) cell
don@talentmarks.com

Don Philabaum

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O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Monday, December 29, 2014 10:04 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Where will the labor market success information be obtained? This is an extremely difficult measure to track. While I agree that it is important, small, rural colleges will have a difficult time providing this information.

Colleges may have similar missions but not be comparable in size or location. It is unfair to compare a community college with 3,000 students in a rural location without public transportation to one with 30,000 student in an urban area. Similarly, a large research institution should not be compared to a small religiously-affiliated private institution.

Constituency: Other (specify below)

Other Constituency (*if supplied*): Community College staff

User E-mail (*if supplied*):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Tuesday, December 30, 2014 1:26 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: One of the metrics being considered to rate higher education institutions is " Graduate School Attendance". A better and less confusing name for this metric is Graduate School Admissions, which is consistent with the definition included in the narrative.

Constituency: University Staff/Faculty

Other Constituency (if supplied):

User E-mail (if supplied): randy-wlaker@utc.edu

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

From: Perez Vergara, Kelly R <krperezv@oaklandcc.edu>
Sent: Monday, January 05, 2015 8:41 AM
To: College Feedback
Subject: College Ratings Comments

To whom it concerns, I have bulleted a few comments regarding the rating system. I am commenting from the perspective of a community college.

- Regarding completion rates data, I have heard much criticism of these rates as being misrepresentative. I can only assume this worry relates to the idea that some students may be saying they are degree-seeking, but need more time in remedial coursework or to explore in general, or who may end up transferring before finishing the degree. I see this complaint as having an obvious solution that addresses a concept missing from this ratings system: student identification of an educational goal and measured progress toward said goal. In other words, can't institutions adjust their policies to require students to meet with an advisor early on before selecting their status as 'first-time degree seeking'? That way, students who are unsure could be categorized perhaps as transfer, undecided, or some other label that allows the college to identify these students, limit the courses they are able to take, and ensure they identify an appropriate goal as soon as possible. Then, students who need more time than the average student to seek say remediation and advising are not counted in the first time degree seeking IPEDS metric. This is one example of how a college could adjust their own practices to ensure the completion rate metric is reflective, as well as how an institution might make policy change to improve student progress/success.
- Regarding labor market success metrics, our institution has begun to look at the alignment of our actual product (i.e., courses and programs) with the employer or transfer institution's needs. For our employment mission, we look at the projected available jobs (openings) in our region for the next three years and compare that to the average historical number of graduates from related educational programs in the same region to compute a gap. This is done for each program we offer, and programs we don't yet offer, so that we can comprehensively identify gaps that show us where in our local economy there may be over and under supply of trained professionals. We have begun to rethink our program offerings based on this information, as we have found that many programs in fact link to no occupations, but instead provide skills generally valuable to many occupations. Metrics like these pose larger challenges for four-year colleges I believe, because it would be hard to justify graduating hundreds of students each year with say degrees in psychology, knowing that this degree doesn't properly prepare students for readily available positions, but instead requires students to continue on into graduate school. Consider other degrees such as philosophy, history, literature, and the numerous other scholarly (i.e., non-technical or professional) programs offered at commonly at four year colleges. Graduates with degrees that do not relate directly to an occupation have been shown in the literature to have lower wages and higher unemployment rates compared with peers who completed technical/professional programs (i.e., engineering, nursing, accounting, marketing, statistics, etc.) Calling the product itself into question will be a critical factor for colleges trying to improve their employment outcomes metrics in this rating system, such as percent of students employed and earnings. Regarding our transfer mission, our college had begun to look not only at percent of students transferring, which cannot be identified as good or bad without additional information, but also as the transferability of our actual courses to popular transfer institutions. This metric is specific, telling us which courses at which institutions do not transfer as expected. Institutions wanting to improve their transfer metrics may need to dig deep and undertake similar initiatives, as the effectiveness of articulation agreements has yet to be studied their function as a solution is suspect.
 - It is these types of metrics identified above that help our institution make decisions about what specifically we need to change to improve big picture metrics like employment, transfer and graduation rates. Therefore, while it will be helpful to compare big picture metrics to other institutions, our more

detailed self-rating system will help us fine tune ourselves. These types of changes then in turn impact the broad metrics used for the new rating system.

Kind regards,

Kelly Perez-Vergara, M.S.
Director of Curriculum Research and Operations
Oakland Community College
Ph. 248-232-4731

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Saturday, January 03, 2015 4:18 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: I am a trustee of the Williamson Free School of Mechanical Trades (www.williamson.edu), an accredited post-secondary institution, established in 1888, located near Media, Pennsylvania which grants an associates degree. Williamson has an endowment of over \$100 million and relies primarily on contributions and endowment income to operate the institution. At present, Williamson receives no federal or state funding.

While it is useful to try to measure access, affordability and outcomes for postsecondary institutions, the framework suggested by the Department of Education will not work for Williamson Free School. Williamson does not provide Pell grants so the number of Pell grants is not a useful measure to determine access to Williamson. Nevertheless, Williamson's deed of trust does provide that preference on admission is given to poor and deserving students. Many of its students would qualify for Pell grants based on their financial need — if Williamson offered Pell grants. Williamson charges no tuition or room and board to all its students but only some modest fees that are less than \$1,000 per year. The fact that Williamson or other colleges provide full or substantial scholarships using their own funds should count in measuring access and affordability. The on-time completion rate at Williamson Free School is over four times the average completion rate of community colleges in Pennsylvania. The job outcomes are spectacular at Williamson but not reported in IPEDS because Williamson receives no federal aid. Virtually all of Williamson's graduates have jobs upon graduation or pursue further education.

Williamson is not the only college which charges no tuition. Other prominent examples are Berea College and College of the Ozarks.

If the Department of Education does decide to pursue some sort of rating system, it should provide ample opportunity for those colleges who do not fit the mold to provide supplemental information that is given real significance in the rating process. In view of the wide variation among educational institutions, It also makes sense not to have a single rating but ratings based on specific categories such as affordability and outcomes.

Constituency: Other (specify below)

Other Constituency (if supplied): trustee of private college

User E-mail (if supplied):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: (b)(6)
Sent: Friday, January 02, 2015 11:00 AM
To: College Feedback
Subject: A New System of College Ratings Comments from Kevin M. Bronner Ph.D.
Attachments: New System of College Ratings Comments by Kevin M. Bronner.docx; Kevin M. Bronner Ph.D. Comments Student Internal Rate of Return.xlsx

Please accept the attached comments on Kevin M. Bronner on the document entitled "A New System of College Ratings" that was put out for public review during December 2014.

Two documents are attached:

- 1) The comments (4 pages) and,
- 2) A one page Excel spreadsheet.

Thank you for the opportunity to comment on the New System of College Ratings document.

Kevin M. Bronner, Ph.D.

(b)(6)

Attachments

January 2, 2015

To: United States Department of Education
From: Kevin M. Bronner, Ph.D.

RE: Comments of Kevin M. Bronner Ph.D. in Support of a New System of College Ratings

Thank you for the opportunity to comment on the document entitled *A New System of College Ratings* which was made public on December 19, 2014. These comments support portions of the concept as outlined below. I am a Public Service Professor at the University at Albany in Albany, New York and I teach classes in personal financial planning for Freshmen students and for Transfer students. The basic idea behind our classes is to explore how much a college education is costing, and how much money the students will most likely make after graduation. We conduct research on specific job titles such as a biologist or an accountant. We then examine how much the student will most likely earn for a 10 year period after graduation and we also study issues such as student debt levels.

Section #1: Internal Rate of Return Computation for Selected College Majors

The proposed *New System of College Ratings* will enable students and their families to study the costs of college and to determine how much the students will earn after graduation. This process can easily be converted to a type of investment metric where the college or university shows the cost of college for the four year period, and then examines how much the students may earn for the first 10 years as a working professional. An internal rate of return can be computed as a combined metric.¹ This will show the type of profit earned from a successful college graduate based upon their earnings over the next 10 years after graduation.

A simple internal rate of return is presented here for three hypothetical college graduates. It is assumed that the college graduates all make \$40,000 per year for the first 10 years after graduation. Student A who spends about \$21,000 per year for their four years of college education will have an internal rate of return of 29 percent. Student B who spends about \$40,000 per year in college tuition and fees will have a reduced internal rate of return of approximately 15 percent. Student C, who is in the high cost tuition and fee situation of

¹ Page 14 of the *A New System of College Ratings – Invitation to Comment* asks responders to consider the issue of combined metrics.

\$60,000 per year the internal rate of return falls to only 8 percent². These simple calculations are shown in the attached Excel spreadsheet. It only takes a couple of minutes to perform these calculations.

The metrics included in this analysis can easily be refined to include actual college tuition and costs and real salaries. The beginning salary levels for most college majors is included in the statistics published by the Bureau of Labor Statistics.³ The metrics as developed should be computed for students with individual selected majors and not just for the aggregate of all students in the college.⁴

Colleges and universities could then be ranked according to the most likely internal rate of return that the students are expected to earn on their college investment. In the example provided above Student A would have the highest ranking for value earned from the college education. Student B would place second and Student C would be ranked last.

Recommendation #1: The Education Department should require colleges and universities to present an internal rate of return computation for specific college majors showing the cost of the college education and the expected earnings for 10 years after graduation. An internal rate of return should be presented for selected college majors.

* * *

Section #2: Student Loan Debt Refunding Calculation

Page 9 of the comment document outlines student loan issues. If a 10 year internal rate of return metric is calculated as shown in Section 1, *supra.*, it would be easy to show how a student's debt burden could be reduced if they earn an average salary for their field of study. A payback period for the student loan burden should be required to be published for each college and university.

Recommendation #2: The Education Department should require colleges and universities to present metrics showing the average amount of student debt that each graduate will have and

² The document put out for comments discusses the *Average Net Price* of a college education at pages 8 – 9.

³ The concept of Labor Market Success is discussed on page 11 of the document put out for comment.

⁴ It is assumed that the internal rate of return presentation could be presented for the ten largest majors in a college or university to keep the analysis simple.

how long it will take them to pay off the loan assuming an average level of earnings after graduation.

* * *

Section #3: Existing Model of Consumer-Friendly Rating Tools

The comment document asked for input in the area of other consumer friendly rating tools.⁵ The Office of the New York State Comptroller has a Fiscal Stress Monitoring System which studies the financial status of local governments in the State of New York.⁶ There are three levels of fiscal stress computed and a metric is published for each local governments. This enables interested parties to view how much fiscal stress a locality is experiencing and whether the problem is getting better or worse. The Education Department could publish a similar metric for the three college groups: high-performing, those in the middle, and for low-performing.

Summary and Conclusions:

The New System of College Ratings will help consumers evaluate the *Average Net Price* of college and can show *Labor Market Success* data for the students after they graduate. This can be accomplished by computing an internal rate of return metric for selected majors in a college, and the same computation can provide data to study how long it will take the average student to pay off their student loan. For the reasons outlined above, the Education Department is urged to consider two specific recommendations for the *New System of College Ratings* program:

Recommendation #1: The Education Department should require colleges and universities to present an internal rate of return computation for selected college majors showing the cost of the college education and the expected earnings for 10 year after graduation. An internal rate of return should be presented for each selected college major.⁷

Recommendation #2: The Education Department should require colleges and universities to present metrics showing the average amount of student debt that each graduate will have and how long it will take them to pay off the loan assuming an average level of earnings after graduation.

⁵ See page 16 of the comment document.

⁶ The system is available at osc.state.ny.us.

⁷ As stated above, to lower the cost of producing the data, the 10 largest groups of majors could be used for this analysis.

Finally, the Office of the New York State Comptroller has an excellent Fiscal Stress Monitoring System that develops specific financial scores for local governments in the State of New York. A similar process could be established to calculate scores for the three types of ratings contemplated in the *New System of College Ratings*.

Thank you for the opportunity to comment in this proceeding.

Respectfully submitted,

s/s

Kevin M. Bronner, Ph.D.

(b)(6)

Attachment: One Page Excel spreadsheet.

**Data to Illustrate the Internal Rate of Return
for the Comments of Kevin M. Bronner, Ph.D.**

		<u>A</u> Low Cost <u>Student</u>	<u>B</u> Medium Cost <u>Student</u>	<u>C</u> High Cost <u>Student</u>
1	College Cost Year 1	-21,000	-40,000	-60000
2	College Cost Year 2	-21,000	-40,000	-60000
3	College Cost Year 3	-21,000	-40,000	-60000
4	College Cost Year 4	-21,000	-40,000	-60000
5	Earnings Per Year	40,000	40,000	40,000
6	"	40,000	40,000	40,000
7	"	40,000	40,000	40,000
8	"	40,000	40,000	40,000
9	"	40,000	40,000	40,000
10	"	40,000	40,000	40,000
11	"	40,000	40,000	40,000
12	"	40,000	40,000	40,000
13	"	40,000	40,000	40,000
14	"	40,000	40,000	40,000
Internal Rate of Return		<u>29%</u>	<u>15%</u>	<u>8%</u>

O'Bergh, Jon

From: John <(b)(6)>
Sent: Monday, January 05, 2015 12:38 PM
To: College Feedback; (b)(6)
Subject: Re: College Rankings

Having been a high school/college counselor for 35 years I will include some of the discussions I had with students and parents regarding how to select an appropriate college. The ideas presented in the Lancaster Newspaper on January 5 seemed on target for helping students and parents compare college information. For my additional suggestions see below.

Four year colleges/universities:

What are the explicit entrance requirements?

What percent of the students complete their degree in four/five/six years? State separately, this information needs to be calculated into the final cost for attending the specific college.

What percent of students procure employment in their field of study immediately after graduation?

What percent of students find gainful employment in any field immediately after graduation?

Will student aid be altered if the student receives private scholarships?

Community Colleges/Two year associate degree programs:

Community colleges need accountability, students can possibly spend two years taking remedial courses without matriculating in actual college level courses - extra MONEY, false sense of accomplishment. Some of these students may be better served at a Career & Technical School.

There is a need to separate the statistics for traditional and non-traditional students.

What percent of students ACTUALLY transfer to a four year degree program (traditional vs non-traditional)?

What percent of students complete the different community college options - ex: certificate, degree, transfer?

How many years does it take students to earn an associate degree? Again, there is a need to differentiate between traditional and non-traditional students.

What are the entrance criteria for students entering the community college with college level courses vs entering the college at a remedial level?

What percent of the entering students actually begin taking all college level courses?

Barbara Titus, former counselor at Conestoga Valley High School, Lancaster, PA, and former counselor/adviser at Harrisburg Area Community College, Lancaster Campus (b)(6)

O'Bergh, Jon

From: Thomas Bryer <Thomas.Bryer@ucf.edu>
Sent: Monday, January 05, 2015 11:53 AM
To: College Feedback
Cc: (b)(6)
Subject: Response to Call for Comments

Dear Colleague:

Thank you for your thoughtful efforts and leadership to enhance institutions of higher education to achieve a “thriving middle class and a stronger, more secure democracy.” I write specifically regarding the outcome measures for labor market success and also offer recommendations for measuring and reporting on, in the words of the framework document, “the important contributions of relative low-paying fields, such as public service. I draw specifically from recommendations contained in a book I recently published (Higher Education beyond Job Creation: Universities, Community, and Citizenship, published with Lexington Books) but go beyond those specific recommendations in some cases.

I am associate professor in the School of Public Administration at the University of Central Florida; I also serve as the director of the Center for Public and Nonprofit Management at the university. From this position, I provide strategic leadership to align university research, teaching, and service with community needs and interests, most particularly in partnership with the government and nonprofit sectors. We measure our success in part based on what I call “Return on Engagement” or ROE; the phrase is intended to contrast with the more common notion of Return on Investment (ROI), as we measure outcomes beyond financial and the easily quantifiable. I would apply the same logic to measures used and/or developed in the higher education rating system.

The core argument presented in my book is that a leading institution of higher education has an obligation in four core domains: job creation, skill development, citizenship cultivation, and knowledge dissemination. Each taken separately represents one goal for the college or university, but if treated in isolation fails to align with the broader goal, which is to strengthen communities and lives. Only if our universities do and measure across the four domains can we claim such success.

In my comments here, I suggest some measures across the four domains. Some may be feasible with existing data held by the Federal government; other measures may be represented by proxy indicators; still others may require additional investment. My closing recommendation is that perhaps for version 2.0 that resources be allocated to collect the data that can give robust meaning to the rating system rather than relying on imperfect measures.

In the area of job creation, I echo some of the suggested measures already identified by the Department of Education. Specifically, I recommend the following: (1) average alumni salary give and ten years post-graduated (calculated by sector of employment), (2) percentage of alumni in public service careers (annual measure), (3) number of alumni who started new for-profit businesses or nonprofit organizations (average over five years), (4) percentage of new business or nonprofit ventures started by alumni that are located within the state/jurisdiction of the university (average over five years), and (5) number of successful patent applications of university-affiliated faculty, staff, students, and alumni (recorded every five years). These measures include recording of university impact in supplying the relative low-paying labor force devoted to public service in either the government or nonprofit sectors.

In the area of skill development, I suggest measures that are potential indicators of the relevance of training provided by the college or university, as well as the adequacy of preparation for employment in a chosen field. The measures include: (1) percentage of employers who hire alumni who require retraining (average over five years), (2) percentage of alumni within five years of graduation who pursue continuing or adult education to fill a gap in skills knowledge (average over five years), (3) percentage of alumni who find full-time employment within their discipline within one year of graduation (average over five years), (4) percentage of alumni employed full time within their discipline give and ten years post-graduation, and (5) percentage of alumni employed full time within the state/jurisdiction of the university.

In the area of citizenship cultivation, I suggest measures that are commonly used in assessing civic health of cities and states (for example, see the data reported by the Corporation for National and Community Service at www.volunteeringinamerica.gov). Indeed, we might suggest that a civically engaged university with civically engaged students will propel the civic health measures of the communities in which they exist. The specific measures I suggest are the following: (1) percentage of alumni who volunteer two or more hours per week in their community (annual), (2) percentage of alumni who contribute 5-7% of their household income to charity per year (annual), (3) percentage of alumni who contribute 8% or more of their household income to charity per year (annual), (4) percentage of alumni who voted in the last local election (bi-annual), (5) percentage of alumni who voted in the last federal election (bi-annual), and (6) percentage of alumni who have worked with others in their community within the past year to address a public concern (annual).

To address the civic mission of the university, the Department of Education might consider using receipt of the Carnegie Classification for Community Engagement. It is described: "Community engagement describes collaboration between institutions of higher education and their larger communities (local, regional/state, national, global) for the mutually beneficial exchange of knowledge and resources in a context of partnership and reciprocity. The purpose of community engagement is the partnership of college and university knowledge and resources with those of the public and private sectors to enrich scholarship, research, and creative activity; enhance curriculum, teaching and learning; prepare educated, engaged citizens; strengthen democratic values and civic responsibility; address critical societal issues; and contribute to the public good." See http://carnegieclassifications.iu.edu/descriptions/community_engagement.php

In the area of knowledge dissemination, in this context, I suggest one measure, which is the percentage of current (undergraduate) students who are engaged in funded research activity.

I appreciate the Department's suggestion to provide space for individual institutions to add additional information to their searchable page in the database that will be created in this process. I suggest the fields for customization be uniform and not open ended. As such, the consumer can assess institutions based on generally the same categories of information. Using the four domains discussed here is a start, and, even if available data are not currently available to populate the four domains, institutions can self-populate based on their own internal tracking and measurement.

I have two more specific reactions to the discussion on the twelfth page of the call for comment. Specifically, there is discussion of excluding from measures of earnings those students who are currently enrolled in school, who have a disability, or who have died. These exclusions are limited to what is possible given available data; other exclusions include those who remove themselves from the workforce to care for a young child or a dependent elder. Additionally, I appreciate the suggestion to topcode to prevent skewing the data when one or a handful of alumni rise to exceptional salary heights. Including a measure of alumni employed in public service careers can serve as a countermeasure in the opposite direction.

In closing, I strongly support this effort to provide ratings of higher education institutions. However, I believe restricting the ratings to data already available is problematic. To make the most of this effort, I urge investment in systematic data collection for the measures deemed most appropriate, so we do not compromise on quality or risk misinterpretation based on data limitations, of which there are several.

Thank you for your time and consideration.

Sincerely,

Thomas A. Bryer, Ph.D.
Director, Center for Public and Nonprofit Management
Associate Professor
School of Public Administration
University of Central Florida
Phone: 407-823-0410
thomas.bryer@ucf.edu
<http://www.cohpa.ucf.edu/directory/thomas-bryer/>

See my Amazon.com Author Page

<http://amzn.com/e/B00N9C2JPU>

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Wednesday, January 07, 2015 3:03 AM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: Large proportions of part-time instructors means students are being cheated out of access to their instructors and programs are more likely to have inconsistent connections among courses because part-time instructors often lack office space, are not paid to provide office hours nor are they typically paid to attend department and planning meetings. Much research exists that reveals a negative correlation between proportions of part-time instructors and graduation rates.

Thus, it is critical to include proportions of part-time instructors when rating colleges because high proportions of part-time instructors has been repeatedly shown to significantly impact student success.

Constituency: Parent

Other Constituency (*if supplied*):

User E-mail (*if supplied*): (b)(6)

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: Dr. Lee H. Grishman <lgrishman@avc.edu>
Sent: Tuesday, January 06, 2015 6:04 PM
To: College Feedback
Subject: College Rating System

It is inappropriate for the federal government to engage in a college rating system. As it is our government should confine itself to those responsibilities associated with providing the ability of its citizens to engage in the "pursuit of happiness" and protect us from enemies foreign and domestic among others.

The U.S. government is too intrusive and requires tax payer resources for its intrusion.

As a professional in higher education I object to any opinions, interventions or any attempt to control in any way the outcomes of education in the country, but rather confine its role to promoting and providing the freedom for educational innovations in states, counties and cities, both public and private.

Any ratings coming from governmental sources will inevitably be prejudiced and political as governmental entities have an agenda and have previous defined outcomes to which the institutions they rate must meet.

Ratings in and of themselves may or may not be a valuable resource for those who consult them. How they are used is dependent on the value placed on them by their user. How ratings are calculated...the criteria used and the assessment of the criteria used is a flawed process from the outset. We are a thinking people with varied opinions and many differing views on every subject and we use the same information differently depending on our nature and proclivities.

How can a governmental agency promulgate definitive results? It is the President's agenda that sets the criteria, or it comes from those who work for him, many will not agree with the criteria and goal of a federal rating system. Having read through the material presented, it is obvious to the reader the predilections and intent of the rating system. As an independent citizen and professional educator I reject the concept.

Leave such assessments to the professionals, the organizations they represent and for the public to decide. I see no legitimate role for the federal government to engage in this arena.

I encourage you to save the taxpayers money and disengage in this process. The federal government is in no position to engage in expanding "college opportunity by recognizing institutions that: excel at enrolling students from all backgrounds, focus on maintaining affordability, and succeed at helping all students graduate." By this very statement the intent and agenda with previous defined outcomes to which the institutions they rate must meet are exposed. It is a flawed concept in every possible way as it presupposes what is best for the American people. That is for the U.S. citizen to decide, not a so called "in loco parentis" governmental agency.

O'Bergh, Jon

From: Kahn, Seth <SKahn@wcupa.edu>
Sent: Tuesday, January 06, 2015 1:13 PM
To: College Feedback
Subject: Feedback on Ratings System

[Hello. Your website won't accept my comment on the web-based form. Please accept this instead. I'm a university faculty member and am already signed up for DoE emails at another address. Thanks. --Seth]

Comment: Conventional, and even more cutting edge, ratings of higher ed institutions often ignore two very important factors I hope you'll take into consideration: the ratio of administrators to faculty (which has increased massively over the same period of time that the public discourse on higher ed has described its collapse!); and the treatment of contingent (adjunct, part-time faculty). Contingent faculty teach the gigantic majority of our nation's undergraduates at all but the most elite institutions (and many of those too), most often being paid peanuts, with few or no benefits and no job security.

If you want to encourage higher ed institutions to enhance the affordability and quality, encourage them to spend a lot less money on administrators whose value is hardly discernible, and a lot more on creating tenable working conditions for the faculty and students who do what universities are for--teaching, learning, and knowledge-making.

Seth Kahn, PhD
Department of English
West Chester University of PA
610.436.2915

"Let's save pessimism for better times." --Eduardo Galeano

"The things we dislike in the present order are sustained by our fearful complicity." --Granny D

O'Bergh, Jon

From: (b)(6) on behalf of Andrew Gillette
<argillette@moreheadstate.edu>
Sent: Monday, January 05, 2015 8:48 PM
To: College Feedback
Subject: Comment on New System of College Ratings

Colleges should get a better rating based on not only how well their graduates are doing (such as employment rate) but also how well they allocate their budget to student resources. For example, let's say college A spends 25% of their budget on administration salaries, and 10% on the resources that would help them be more successful after college (aka study a broad office or career services center). College B should get a better rating if it spends 10% of their budget on administration salaries, and 25% on student resources.

O'Bergh, Jon

From: Robert Kelchen <robert.kelchen@shu.edu>
Sent: Monday, January 05, 2015 8:38 PM
To: College Feedback
Subject: Comments on PIRS metrics

January 5, 2015

My name is Robert Kelchen and I am an assistant professor in the Department of Education Leadership, Management and Policy at Seton Hall University as well as the methodologist for *Washington Monthly* magazine's annual college rankings. (All opinions are my own.) After carefully examining the draft metrics proposed for potential inclusion in the Postsecondary Institution Ratings System (PIRS), I have the following comments and suggestions:

First, I am encouraged by the decision to exclude nondegree-granting colleges (mainly small for-profit colleges) from PIRS, as they are already subject to gainful employment. Holding them accountable for two different metrics is unreasonable. But in the two-year sector, it is essential to rate colleges that primarily grant associate's degrees separately from those that primarily grant certificates due to the different lengths of those programs. The Department must divide two-year colleges up by their program emphasis (degree or certificate) in order for those ratings to be viewed as reasonable.

While I am glad to see discussions of multiple data sources in the draft metrics, I think the focus in the short term has to be using IPEDS data and previously-collected NSLDS data for student loan repayment or default rates. Using NSLDS data for student background characteristics (such as first-generation status) is nice for the future, but is unlikely to be ready by this fall—particularly if colleges wish to dispute those data. I encourage the Department to focus on two sets of measures: refining readily available metrics from IPEDS and NSLDS for the draft ratings and continuing to develop new metrics for 2018 and beyond.

Most of the metrics proposed seem reasonable, although I am thoroughly confused by the "EFC gap" metric due to the lack of details provided. Would this be a measure of unmet need, of the percentage of FAFSA filers below a certain EFC, or something else? The Department should consider how strongly correlated the EFC gap measure may be with existing net price or family income data already in IPEDS—and also issue additional guidance on what the metric might be so the public can provide more informed comments.

I was disappointed not to see a technical discussion of potential weights that could be used in the system, and there were no mentions of the possibility of using multiple years of data in developing PIRS. It is important that the ratings be reasonably robust to a number of model specifications, including variables selected and weights used. I encourage the Department to continue working in this area and consulting with statisticians and education researchers.

While I do not expect PIRS to be tied to any federal financial aid dollars—and it is quite possible that draft ratings are never released to the public—the Department has a tremendous opportunity to improve data collection. Overturning the ban on student unit record data would significantly improve the quality of the data, but this is a great time to have a conversation about what information should be collected and processed for both public-sector and private-sector accountability systems. I am happy to provide assistance to the Department if desired and I wish them the best of luck in this difficult endeavor.

Robert

Robert Kelchen
Assistant Professor

Department of Education Leadership, Management and Policy
Seton Hall University
robert.kelchen@shu.edu

O'Bergh, Jon

From: WordPress <WEB@ed.gov>
Sent: Wednesday, January 07, 2015 2:11 PM
To: College Feedback
Subject: User Comment on New System of College Ratings

User Comment: My suggestions concern affordability and outcome measures, and the data that could be used to measure them, in state colleges and universities.

Affordability:

– Percentage of college/university budget and tuition that are subsidized by state monies, which of course impacts the sticker price of college. The trend in reduction of state funding to higher education needs the spotlight.

Outcomes:

- Percentage of adjunct/contingent professors versus full-time/tenure track professors (studies show that increased reliance on adjunct professors reduces the overall quality of the university experience). Another, broader, way to look at this is what type of job security exists for which faculty.
- Percentage of university budget costs going to administrative salaries and expenses versus academic salaries and expenses (ie., administrative versus program expenses, the latter directly impacting the “clients” — this really needs to be examined seriously... if non-profits are examined this way for rating systems, why shouldn't universities?)
- Percentage of budget going directly to academic expenses (versus buildings and sports).
- Student and faculty satisfaction (these tend to be interrelated, as learning conditions are teaching conditions).

There doesn't seem to be a rubric for quality of education (otherwise the above metrics could go there) so I'm putting them under “Outcomes.” (Presumably, outcomes indirectly measure the quality of the education, not necessarily the other way around. But then where do we put “quality of education”?)

Overall, transparency (financial and academic) is a huge issue, as the draft mentions, and needs to be thoroughly addressed.

Constituency: University Staff/Faculty

Other Constituency (if supplied): I am also a tax-payer and parent of a future college-goer.

User E-mail (if supplied):

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This e-mail was sent from a contact form on ED.gov Blog (<http://www.ed.gov/blog>)

O'Bergh, Jon

From: Wisam Mahra <wmahra@kennesaw.edu>
Sent: Friday, January 09, 2015 12:13 PM
To: College Feedback
Subject: Ratings feedback

To Whom It May Concern:

When I first heard about a national college rating system, I was enthusiastic and optimistic of an opportunity to inform college bound students of the choices ahead of them. For someone who has worked with students seeking college admission for over 10 years, this seemed to be a truly worthwhile endeavor. Yet, the more I dive deeper into the proposal, I find it rife with potential loopholes and areas of concern. I feel that this process is a band-aid to public sentiment and perception over the value of going to college.

It appears that what is be proposed is eerily similar to what can already by found on line and further perpetuates the stigmatization of access schools. The criteria of evaluation is too simplistic as it appears to take data (IPEDS, etc) from colleges by placing them into very narrow categories without taking into account populations served, market perceptions (they do play a part!), and difficulty.

Using affordability, graduation rates, and job placements rates are part of the criterion are putting responsibility on colleges and universities of processes they can somewhat control.

In regard to affordability and graduation rates, will the ratings system penalize institutions if students don't graduate for legitimate reasons, e.g. lack of financial resources, illness, or lack of personal preparedness.

In terms of affordability, there simply needs to be more funding and aid in place. All across the country funds have been cut percentage wise year to year and has not kept with increasing tuitions. In all the years I've been in admissions, the number one factor holding able and willing students back is money.

If we really want to rank a school on how well it serves it's kids in terms of affordability, I'd suggesting looking at overall cost, percentage of students who receive institutional aid, lowest amount of financial gap, and whose overall debt burden at graduation is lowest. For example, my brother went to modest state school, got a great education, yet ended up with \$40k+ in debt. Imagine how hard it is as a young person trying to establish yourself professionally, starting from the bottom, when your student loan payments are \$700+ a month. We wonder why kids are defaulting? There needs to be caps on the interest on private student loans.

Furthermore, institutions provide the tools, resources, and opportunities for job placement, however this ranking system will further insinuate that the colleges are expensive job placement agencies which guarantee employment. There is no consideration for the talent, in demand majors, and corporate recruiting done to prepare

students for the job market. To cast all institutions in narrow categories would be dangerous and irresponsible. This falsely implies that every student who goes to college regardless of ability and personal effort will guaranteed employment.

If we really want to solve this national crisis, why don't we measure which schools by the highest percentage of graduates who pay back their student loans on time and percentage of grant or scholarship aid given. That would imply that they are finding gainful employment and the school was somewhat affordable (still this comes with caveats).

In conclusion, I hope this will result in something meaningful rather than an empty attempt to placate public opinion.

I wish you the best of luck.

Sincerely,

Sam Mahra

*Please note that the reflection expressed do not reflect those of my employer and are solely my own.